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Attorney for Plaintiff and Cross-Defendant
CHURCH OF SCIENTOLOGY OF CALIFORNIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LD
9-16

CHURCH OF SCIENTOLOGY OF)
CALIFORNIA, a California)
Corporation,)
Plaintiff,)
vs.)
GERALD ARMSTRONG, et al.,)
Defendants.)

Case No. C 420 153
[SEVERED ACTION]
REQUEST FOR ADMISSIONS
[C.C.P. § 2033]
(Set No. 3)

GERALD ARMSTRONG,)
Cross-Complainant,)
vs.)
CHURCH OF SCIENTOLOGY OF)
CALIFORNIA, a California)
Corporation, L. RON HUBBARD,)
CHURCH OF SCIENTOLOGY)
INTERNATIONAL, RELIGIOUS)
TECHNOLOGY CENTER, et al.)
Cross-Defendants)

Case No. C 420 153
[SEVERED ACTION]
REQUEST FOR ADMISSIONS
[C.C.P. § 2033]
(Set No. 1)

1 TO: ALL PARTIES, AND TO THEIR ATTORNEYS OF RECORD HEREIN:
2
3

4 PLEASE TAKE NOTICE that plaintiff and cross-defendant, CHURCH OF
5 SCIENTOLOGY OF CALIFORNIA, a California corporation, hereby requests that
6 defendant and cross-complainant, GERALD ARMSTRONG, admit, pursuant to
7 Code of Civil Procedure, Section 2033, the truth of each of the following
8 matters of fact within thirty (30) days after the date of service of this
9 request.
10
11

12 INSTRUCTIONS
13

14 1. The term "genuine" as used herein is defined as "not
15 artificial or fake; real; authentic".
16

17 2. The term "auditing" as used herein is defined as "spiritual
18 counselling administered by someone trained in the application of
19 Scientology technology to another person for the purpose of increasing
20 that person's abilities by ridding them of unwanted spiritual barriers or
21 travail."
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23 3. The term "Cross-Complaint" as used herein is defined as the
24 "Third Amended Cross-Complaint for Damages" filed in the instant suit on
25 or about July 1, 1983.
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1 4. The term "Sea Organization" as used herein is defined as "a
2 fraternal organization within the Church of Scientology."
3

4 5. The term "preclear folder" as used herein is defined as "a
5 folder, generally a common manila file folder, in which all statements
6 made by a person receiving auditing are recorded and maintained; and
7 which may also include instructions to, or questions and/or observations
8 by, the person(s) who have administered said auditing."
9

10 6. The term "Petition" as used herein is defined as "a formal
11 written document to a person or group in authority asking that a right or
12 a privilege be granted to the originator," and it specifically refers to
13 the "Petition" submitted by GERALD ARMSTRONG to L. RON HUBBARD on or
14 about January 8, 1980.
15

16 7. The term "personal knowledge" as used herein is defined as
17 "knowledge obtained by or through one's own sense perception," and does
18 not include knowledge otherwise obtained; specifically, it does not
19 include knowledge learned solely through conversation with another person.
20

21 8. The term "Scientology organizations" as used herein is defined
22 as "organizations and/or corporations, wherever situated and in any and
23 all time periods between January, 1950 and the present date, which are or
24 were composed primarily of members of the Church of Scientology and/or
25 the Sea Organization."
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1 9. The term "Archives Project" as used herein is defined as "that
2 collection and compilation of documents, papers, binders, photographs,
3 memorabilia, artifacts, filing cabinets and filing folders, photographic
4 negatives, diaries, journals, correspondence, interviews, information and
5 other similar material related to L. RON HUBBARD, Dianetics and
6 Scientology in any form or fashion which was initially carried out by
7 GERALD ARMSTRONG during the period between January, 1980 and December,
8 1981, inclusive.

9
10 10. The term "Rehabilitation Project Force" as used herein is
11 defined as "that group of persons who have proven themselves incapable of
12 properly carrying out the duties assigned to them, and who have
13 voluntarily chosen to be members of said group in order to obtain the
14 assistance they need in order to redeem themselves by demonstrating such
15 capability."

16
17 11. The term "good standing" as used herein is defined as being
18 free to enjoy all benefits and services offered by, or which can be
19 obtained from, membership in the Church of Scientology; specifically,
20 being free to receive spiritual counselling and/or training if and as
21 desired or needed.

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1 REQUEST FOR ADMISSIONS

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3 REQUEST FOR ADMISSIONS NO. 1:

4 The document annexed hereto as Exhibit "1" and incorporated by
5 reference into this Request for Admission No. 1 is genuine.
6

7 REQUEST FOR ADMISSIONS NO. 2:

8 The document annexed hereto as Exhibit "1" and incorporated by
9 reference into this Request for Admission No. 2 contains the genuine
10 signature of GERALD ARMSTRONG.
11

12 REQUEST FOR ADMISSIONS NO. 3:

13 GERALD ARMSTRONG had personal knowledge as of 12 April 1980 that
14 no claims, promises or representations were made to him "with respect to
15 the E-Meter being able to cure, diagnose or otherwise prevent or detect
16 any disease or ailment."
17

18 REQUEST FOR ADMISSIONS NO. 4:

19 GERALD ARMSTRONG claims he knew of the dissemination of his
20 confidential auditing disclosures in December 1975 in Daytona Beach,
21 Florida.
22

23 REQUEST FOR ADMISSIONS NO. 5:

24 GERALD ARMSTRONG claims he knew of the dissemination of other's
25 confidential auditing disclosures in December 1975 in Daytona Beach,
26 Florida.

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1 REQUEST FOR ADMISSIONS NO. 6:

2 If Graham Leese, Kingsley Wimbush, Helen Pollen, Dorothy Knight,
3 Jan Norton and/or Ann Tasket made the representations alleged in
4 paragraphs 14(a)-(j), 17(a)-(h), 37(a)-(f) and 38(a)-(b) of the
5 Cross-Complaint, they were sincere in doing so.
6

7 REQUEST FOR ADMISSIONS NO. 7:

8 If Graham Leese, Kingsley Wimbush, Helen Pollen, Dorothy Knight,
9 Jan Norton and/or Ann Tasket made the representations alleged in
10 paragraphs 14(a)-(j), 17(a)-(h), 37(a)-(f) and 38(a)-(b) of the
11 Cross-Complaint, they did so as an expression of their faith and belief
12 in the religion of Scientology.
13

14 REQUEST FOR ADMISSIONS NO. 8:

15 GERALD ARMSTRONG has not paid for any Scientology courses and/or
16 auditing since becoming a member of the Sea Organization in or about
17 February 1971.
18

19 REQUEST FOR ADMISSIONS NO. 9:

20 Graham Leese, Kingsley Wimbush, Helen Pollen, Dorothy Knight, Jan
21 Norton and/or Ann Tasket demonstrated no written authorization from L.
22 RON HUBBARD to contract with GERALD ARMSTRONG on Mr. HUBBARD'S behalf at
23 any time.

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1 REQUEST FOR ADMISSIONS NO. 10:

2 Graham Leese, Kingsley Wimbush, Helen Pollen, Dorothy Knight, Jan
3 Norton and/or Ann Tasket demonstrated to GERALD ARMSTRONG no written
4 authorization from CHURCH OF SCIENTOLOGY OF CALIFORNIA to contract with
5 him on CHURCH OF SCIENTOLOGY OF CALIFORNIA'S behalf at any time.

6
7 REQUEST FOR ADMISSIONS NO. 11:

8 Graham Leese, Kingsley Wimbush, Helen Pollen, Dorothy Knight, Jan
9 Norton and/or Ann Tasket demonstrated to GERALD ARMSTRONG no written
10 consent or evidence of knowledge by L. RON HUBBARD to enable them to
11 contract with him at any time on Mr. HUBBARD'S behalf.

12
13 REQUEST FOR ADMISSIONS NO. 12:

14 Graham Leese, Kingsley Wimbush, Helen Pollen, Dorothy Knight, Jan
15 Norton and/or Ann Tasket demonstrated to GERALD ARMSTRONG no written
16 consent or evidence of knowledge by CHURCH OF SCIENTOLOGY OF CALIFORNIA
17 to enable them to contract with him at any time on CHURCH OF SCIENTOLOGY
18 OF CALIFORNIA'S behalf.

19
20 REQUEST FOR ADMISSIONS NO. 13:

21 L. RON HUBBARD never personally delivered auditing to GERALD
22 ARMSTRONG.

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24 REQUEST FOR ADMISSIONS NO. 14:

25 L. RON HUBBARD never personally reviewed or examined the preclear
26 folder of GERALD ARMSTRONG.

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1 REQUEST FOR ADMISSIONS NO. 15:

2 GERALD ARMSTRONG has never requested return of any monies
3 allegedly retained by L. RON HUBBARD.
4

5 REQUEST FOR ADMISSIONS NO. 16:

6 GERALD ARMSTRONG has never requested return of any monies
7 allegedly retained by CHURCH OF SCIENTOLOGY OF CALIFORNIA.
8

9 REQUEST FOR ADMISSIONS NO. 17:

10 GERALD ARMSTRONG discontinued auditing on his own volition in June
11 1981.
12

13 REQUEST FOR ADMISSIONS NO. 18:

14 GERALD ARMSTRONG left Scientology without giving formal prior
15 notice in December 1981.
16

17 REQUEST FOR ADMISSIONS NO. 19:

18 GERALD ARMSTRONG left the Sea Organization without giving formal
19 prior notice in December 1981.
20

21 REQUEST FOR ADMISSIONS NO. 20:

22 The document annexed hereto as Exhibit "2" and incorporated by
23 reference into this Request for Admission No. 20 is a true and accurate
24 copy of the "Petition" submitted to L. Ron Hubbard by GERALD ARMSTRONG in
25 or about January 1980.

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1 REQUEST FOR ADMISSIONS NO. 21:

2 The document annexed hereto as Exhibit "2" and incorporated by
3 reference into this Request for Admission No. 21 includes two lines
4 labelled "R OK" and "R Not OK", one of which was to have been signed or
5 initialed by L. RON HUBBARD indicating his approval or disapproval of
6 said Petition.

7
8 REQUEST FOR ADMISSIONS NO. 22:

9 The document annexed hereto as Exhibit "2" and incorporated by
10 reference into this Request for Admission No. 22 was received back by
11 GERALD ARMSTRONG with no signature or initial indicating either approval
12 or disapproval.

13
14 REQUEST FOR ADMISSIONS NO. 23:

15 GERALD ARMSTRONG has no personal knowledge that the document
16 annexed hereto as Exhibit "2" and incorporated by reference into this
17 Request for Admission No. 23 was ever reviewed or seen by L. RON HUBBARD.

18
19 REQUEST FOR ADMISSIONS NO. 24:

20 The position of "LRH Senior Personal Public Relations Office
21 Researcher" was a position within the CHURCH OF SCIENTOLOGY OF CALIFORNIA.

22
23 REQUEST FOR ADMISSIONS NO. 25:

24 GERALD ARMSTRONG transferred from one position within the CHURCH
25 OF SCIENTOLOGY OF CALIFORNIA to another position within said Church in
26 assuming the title and duties of the LRH Senior Personal Public Relations
27 Office Researcher.

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1 REQUEST FOR ADMISSIONS NO. 26:

2 GERALD ARMSTRONG was not working for L. RON HUBBARD after leaving
3 Scientology in or about December 1981.

4
5 REQUEST FOR ADMISSIONS NO. 27:

6 GERALD ARMSTRONG was not working for Scientology, or any
7 Scientology organization, after leaving Scientology in or about December
8 1981.

9
10 REQUEST FOR ADMISSIONS NO. 28:

11 GERALD ARMSTRONG was not, at any time, promised any compensation
12 by L. RON HUBBARD for work performed on the proposed biography of L. RON
13 HUBBARD.

14
15 REQUEST FOR ADMISSIONS NO. 29:

16 GERALD ARMSTRONG has not suffered any loss of reputation as a
17 result of the "Suppressive Person Declare Gerry Armstrong", annexed
18 hereto as Exhibit "3" and incorporated by reference herein to this
19 Request for Admission No. 29 .

20
21 REQUEST FOR ADMISSIONS NO. 30:

22 GERALD ARMSTRONG was a staff member of Scientology organizations
23 between February 1971 and December 1981.

24
25 REQUEST FOR ADMISSIONS NO. 31:

26 GERALD ARMSTRONG was directly in charge of, and responsible for,
27 the Archives Project between January 1980 and December 1981.

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1 REQUEST FOR ADMISSIONS NO. 32:

2 The Archives Project involved the collecting and maintaining of
3 information, artifacts and memorabilia concerning Scientology, Dianetics
4 and L. RON HUBBARD.

5
6 REQUEST FOR ADMISSIONS NO. 33:

7 Part of the responsibility of GERALD ARMSTRONG with respect to the
8 Archives Project was to collect and maintain documents, information and
9 artifacts concerning the early history of Dianetics and Scientology.

10
11 REQUEST FOR ADMISSIONS NO. 34:

12 Part of the responsibility of GERALD ARMSTRONG with respect to the
13 Archives Project was to collect and maintain documents, information and
14 artifacts regarding L. RON HUBBARD.

15
16 REQUEST FOR ADMISSIONS NO. 35:

17 As part of his responsibility with respect to the Archives
18 Project, GERALD ARMSTRONG was authorized to travel and to interview
19 persons concerning the history of Dianetics and Scientology and
20 concerning L. RON HUBBARD.

21
22 REQUEST FOR ADMISSIONS NO. 36:

23 As part of his responsibility with respect to the Archives
24 Project, GERALD ARMSTRONG was authorized to negotiate for the purchase of
25 materials and artifacts concerning the history of Dianetics and
26 Scientology and concerning the life of L. RON HUBBARD.

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1 REQUEST FOR ADMISSIONS NO. 37:

2 During the time that GERALD ARMSTRONG was in charge of the
3 Archives Project, from in or about February 1980 to December 1981, said
4 project was located at 4833 Fountain Avenue, Los Angeles, California.
5

6 REQUEST FOR ADMISSIONS NO. 38:

7 As part of his responsibility with respect to the Archives
8 Project, GERALD ARMSTRONG was responsible for coordinating with Omar V.
9 Garrison, an author who had been retained to write an authorized
10 biography of L. RON HUBBARD, and to provide Omar V. Garrison with
11 information he might require for said biography.
12

13 REQUEST FOR ADMISSIONS NO. 39:

14 During the time that GERALD ARMSTRONG was in charge of the
15 Archives Project, between in or about January 1980 and December 1981, a
16 portion of the materials contained in said project was the personal
17 property of CHURCH OF SCIENTOLOGY OF CALIFORNIA.
18

19 REQUEST FOR ADMISSIONS NO. 40:

20 During the time that GERALD ARMSTRONG was in charge of the
21 Archives Project, between December 1980 and December 1981, he removed
22 original materials contained in said project from their location within
23 said project's area.

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1 REQUEST FOR ADMISSIONS NO. 41:

2 During the time that GERALD ARMSTRONG was in charge of the
3 Archives Project, between December 1980 and December 1981, he removed
4 copies of original materials then contained in said project from their
5 location within said project's area.

6
7 REQUEST FOR ADMISSIONS NO. 42:

8 During the period from January, 1982 through and including
9 September 2, 1982, GERALD ARMSTRONG maintained in his possession or in
10 the possession of his attorneys, agents or others designated by him,
11 copies of materials contained in the Archives Project at the time
12 ARMSTRONG was in charge of said project.

13
14 REQUEST FOR ADMISSIONS NO. 43:

15 During the period from January, 1982 through and including
16 September 2, 1982, GERALD ARMSTRONG maintained in his possession or in
17 the possession of his attorneys, agents or others designated by him,
18 original materials that had been contained in the Archives Project at the
19 time ARMSTRONG was in charge of said project.

20
21 REQUEST FOR ADMISSIONS NO. 44:

22 During the period from May, 1982 through and including August,
23 1982, GERALD ARMSTRONG provided copies of materials contained in the
24 Archives Project at the time he was in charge of said project to persons
25 who had not been authorized by CHURCH OF SCIENTOLOGY OF CALIFORNIA to
26 receive said materials.

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1 REQUEST FOR ADMISSIONS NO. 45:

2 During the period from May, 1982 through and including August,
3 1982, GERALD ARMSTRONG provided copies of materials contained in the
4 Archives Project at the time he was in charge of said project to persons
5 who had not been authorized by L. RON HUBBARD or MARY SUE HUBBARD to
6 receive said materials.

7
8 REQUEST FOR ADMISSIONS NO. 46:

9 During the period from May, 1982 through and including August,
10 1982, GERALD ARMSTRONG provided original materials contained in the
11 Archives Project at the time he was in charge of said project to persons
12 who had not been authorized by CHURCH OF SCIENTOLOGY OF CALIFORNIA to
13 receive said materials.

14
15 REQUEST FOR ADMISSIONS NO. 47:

16 During the period from May, 1982 through August, 1982, GERALD
17 ARMSTRONG provided original materials that had been contained in the
18 Archives Project at the time he was in charge of said project to persons
19 who had not been authorized by L. RON HUBBARD or MARY SUE HUBBARD to
20 receive said materials.

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22 REQUEST FOR ADMISSIONS NO. 48:

23 While performing his responsibilities concerning the Archives
24 Project, GERALD ARMSTRONG was aware of the confidential nature of the
25 materials contained in said project.

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1 REQUEST FOR ADMISSIONS NO. 49:

2 Between March, 1982 and August, 1982, GERALD ARMSTRONG acted
3 without authority of CHURCH OF SCIENTOLOGY OF CALIFORNIA in making copies
4 of materials that had been in the Archives Project at the time he was in
5 charge of said project.

6
7 REQUEST FOR ADMISSIONS NO. 50:

8 Between March, 1982 and August, 1982, inclusive, GERALD ARMSTRONG
9 acted without authority of L. RON HUBBARD and/or MARY SUE HUBBARD in
10 making copies of materials contained in the Archives Project at the time
11 he was in charge of said project.

12
13 REQUEST FOR ADMISSIONS NO. 51:

14 Between March, 1982 and September, 1982, inclusive, GERALD
15 ARMSTRONG acted without authority of CHURCH OF SCIENTOLOGY OF CALIFORNIA
16 in obtaining from Omar V. Garrison materials contained in the Archives
17 Project at the time he was in charge of said project.

18
19 REQUEST FOR ADMISSIONS NO. 52:

20 Between March, 1982 and September, 1982, inclusive, GERALD
21 ARMSTRONG acted without authority of CHURCH OF SCIENTOLOGY OF CALIFORNIA
22 in retaining from Omar V. Garrison materials contained in the Archives
23 Project at the time he was in charge of said project.

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1 REQUEST FOR ADMISSIONS NO. 53:

2 Between March, 1982 and September, 1982, inclusive, GERALD
3 ARMSTRONG acted without authority of L. RON HUBBARD and/or MARY SUE
4 HUBBARD in obtaining from Omar V. Garrison materials contained in the
5 Archives Project at the time he was in charge of said project.

6
7 REQUEST FOR ADMISSIONS NO. 54:

8 Between March, 1982 and September, 1982, inclusive, GERALD
9 ARMSTRONG acted without authority of L. RON HUBBARD and/or MARY SUE
10 HUBBARD in retaining from Omar V. Garrison materials contained in the
11 Archives Project at the time he was in charge of said project.

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14 REQUEST FOR ADMISSIONS NO. 55:

15 Between March, 1982 and September, 1982, inclusive, GERALD
16 ARMSTRONG possessed for his own purposes and without authorization of
17 CHURCH OF SCIENTOLOGY OF CALIFORNIA, original materials that had been
18 contained in the Archives Project at the time he was in charge of said
19 project.

20
21 REQUEST FOR ADMISSIONS NO. 56:

22 Between March, 1982 and September, 1982, inclusive, GERALD
23 ARMSTRONG possessed for his own purposes and without authorization of L.
24 RON HUBBARD and/or MARY SUE HUBBARD, original materials that had been
25 contained in the Archives Project at the time he was in charge of said
26 project.

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1 REQUEST FOR ADMISSIONS NO. 57:

2 Between March, 1982 and September, 1982, inclusive, GERALD
3 ARMSTRONG possessed for his own purposes and without authorization of
4 CHURCH OF SCIENTOLOGY OF CALIFORNIA, copies of materials that had been
5 contained in the Archives Project at the time he was in charge of said
6 project.

7
8 REQUEST FOR ADMISSIONS NO. 58:

9 Between March, 1982 and September, 1982, inclusive, GERALD
10 ARMSTRONG possessed for his own purposes and without authorization of L.
11 RON HUBBARD and/or MARY SUE HUBBARD, copies of materials that had been
12 contained in the Archives Project at the time he was in charge of said
13 project.

14
15 REQUEST FOR ADMISSIONS NO. 59:

16 GERALD ARMSTRONG requested and accepted the position whereby he
17 was placed in charge of the Archives Project.

18
19 REQUEST FOR ADMISSIONS NO. 60:

20 GERALD ARMSTRONG both delivered and received auditing while in the
21 Rehabilitation Project Force between July, 1976 and December, 1977.

22
23 REQUEST FOR ADMISSION NO. 61:

24 The preclear folder of GERALD ARMSTRONG was made available to the
25 Rehabilitation Project Force to enable him to receive auditing between
26 July, 1976 and December, 1977.

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1 REQUEST FOR ADMISSIONS NO. 62:

2 GERALD ARMSTRONG was the Rehabilitation Project Force "Bosun",
3 that member of the Rehabilitation Project Force in charge of the other
4 members of that group, for the majority of the period between July, 1976
5 and December, 1977.

6
7 REQUEST FOR ADMISSIONS NO. 63:

8 GERALD ARMSTRONG knows of no one who has ever been assassinated by
9 members, agents and/or employees of the Church of Scientology, of the
10 Guardian's Office, and/or of the Sea Organization.

11
12 REQUEST FOR ADMISSIONS NO. 64:

13 GERALD ARMSTRONG has not been fearful of physical harm by the
14 following since in or about February, 1983:

- 15 a. Members of the Church of Scientology;
16 b. Agents of the Church of Scientology;
17 c. Employees of the Church of Scientology.

18
19 REQUEST FOR ADMISSIONS NO. 65:

20 GERALD ARMSTRONG has not received or sought any medical care,
21 treatment or therapy from licensed medical practitioners or therapists as
22 a result of any alleged actions taken against him by anyone named in the
23 above Request for Admissions No. 64 since December, 1981.

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1 REQUEST FOR ADMISSIONS NO. 66:

2 GERALD ARMSTRONG has not received or sought any psychiatric and/or
3 psychological care, treatment or therapy from licensed psychiatric or
4 psychological practitioners or therapists as a result of any alleged
5 actions taken against him by anyone named in the above Request for
6 Admissions No. 64 since December, 1981.

7
8 REQUEST FOR ADMISSIONS NO. 67:

9 Between March, 1982 and August, 1982, inclusive, and solely for
10 the purpose of using them in his legal case, GERALD ARMSTRONG obtained
11 from Omar V. Garrison original materials and copies of original materials
12 which had been contained in the Archives Project at the time he was in
13 charge of said project.

14
15 REQUEST FOR ADMISSIONS NO. 68:

16 GERALD ARMSTRONG did not inform Omar V. Garrison of the total
17 number of original materials and copies of original materials, which he
18 obtained from Omar V. Garrison between March, 1982 and September, 1982,
19 inclusive, that he was retaining in his possession during the same time
20 period.

21
22 REQUEST FOR ADMISSIONS NO. 69:

23 GERALD ARMSTRONG did not have authorization from Omar V. Garrison
24 to obtain and retain in his possession all of the original materials, and
25 copies of original materials, which ARMSTRONG obtained and retained in
26 his possession between March, 1982 and September, 1982, inclusive.

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1 REQUEST FOR ADMISSIONS NO. 70:

2 GERALD ARMSTRONG did not have authorization from Omar V. Garrison
3 to send, transmit, give or otherwise present to Michael J. Flynn any
4 materials which he had obtained from Omar V. Garrison between March, 1982
5 and September, 1982, inclusive.

6
7 REQUEST FOR ADMISSIONS NO. 71:

8 GERALD ARMSTRONG did not have authorization at any time from Omar
9 V. Garrison to send, transmit, give or otherwise present to Michael J.
10 Flynn any materials related solely to the proposed biography of L. RON
11 HUBBARD.

12
13 REQUEST FOR ADMISSIONS NO. 72:

14 GERALD ARMSTRONG did not have authorization from Omar V. Garrison
15 to send, transmit, give or otherwise present to the law firm of Contos &
16 Bunch any materials which he had obtained from Omar V. Garrison between
17 March, 1982 and September, 1982, inclusive.

18
19 REQUEST FOR ADMISSIONS NO. 73:

20 GERALD ARMSTRONG did not have authorization at any time from Omar
21 V. Garrison to send, transmit, give or otherwise present to the law firm
22 of Contos & Bunch any materials related solely to the proposed biography
23 of L. RON HUBBARD.

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1 REQUEST FOR ADMISSIONS NO. 74:

2 Between June, 1982 and August, 1983, inclusive, GERALD ARMSTRONG
3 knowingly allowed Michael J. Flynn to utilize some of the original
4 materials and copies of original materials, which he had sent to Michael
5 J. Flynn during the same time period, in litigation other than the
6 instant suits.

7
8 REQUEST FOR ADMISSIONS NO. 75:

9 On or about May 26-28, 1982, at the Hotel Bonaventure in Los
10 Angeles, California, GERALD ARMSTRONG personally delivered to Michael J.
11 Flynn about 4,000 copies of original materials which had been contained
12 in the Archives Project when ARMSTRONG was in charge of said project.

13
14 REQUEST FOR ADMISSIONS NO. 76:

15 The first instance in which GERALD ARMSTRONG sent, transmitted,
16 gave or otherwise presented Michael J. Flynn with original materials or
17 copies of original materials which had been contained in the Archives
18 Project when ARMSTRONG was in charge of said project occurred on or about
19 May 26-28, 1982 in the Hotel Bonaventure in Los Angeles, California.

20
21 REQUEST FOR ADMISSIONS NO. 77:

22 Jocelyn Armstrong was present at the meeting between GERALD
23 ARMSTRONG and Michael J. Flynn on or about May 26-28, 1982 in the Hotel
24 Bonaventure in Los Angeles, California.

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1 REQUEST FOR ADMISSIONS NO. 78:

2 Jocelyn Armstrong was informed of the planned delivery described
3 above in Requests for Admission Numbers 75 and 76 and incorporated by
4 reference herein to this Request for Admissions No. 78, by GERALD
5 ARMSTRONG prior to said delivery taking place.

6
7 REQUESTS FOR ADMISSIONS NO. 79:

8 Michael J. Flynn has not relinquished custody to the Clerk of the
9 Court, Superior Court of the State of California for the County of Los
10 Angeles, of all copies of original materials which had been contained in
11 the Archives Project when GERALD ARMSTRONG was in charge of said project,
12 and which were furnished to him by ARMSTRONG between April, 1982 and
13 September, 1982, inclusive.

14
15 REQUESTS FOR ADMISSIONS NO. 80:

16 GERALD ARMSTRONG has not relinquished custody to the Clerk of the
17 Court, Superior Court of the State of California for the County of Los
18 Angeles, of all copies of original materials which had been contained in
19 the Archives Project when he was in charge of said project, and which he
20 obtained from Omar V. Garrison between March, 1982 and September, 1982,
21 inclusive.

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1 REQUESTS FOR ADMISSIONS NO. 81:

2 Michael J. Flynn has not relinquished custody to the Clerk of the
3 Court, Superior Court of the State of California for the County of Los
4 Angeles, of all original materials which had been contained in the
5 Archives Project when GERALD ARMSTRONG was in charge of said project, and
6 which were furnished to him by ARMSTRONG between April, 1982 and
7 September, 1982, inclusive.

8
9 REQUESTS FOR ADMISSIONS NO. 82:

10 GERALD ARMSTRONG has not relinquished custody to the Clerk of the
11 Court, Superior Court of the State of California for the County of Los
12 Angeles, of all original materials which had been contained in the
13 Archives Project when he was in charge of said project, and which he
14 obtained from Omar V. Garrison between March, 1982 and September, 1982,
15 inclusive.

16
17 REQUESTS FOR ADMISSIONS NO. 83:

18 On October 30-31, 1982, in Long Island, New York, a meeting was
19 held in which GERALD ARMSTRONG, Jocelyn Armstrong, Ronald DeWolf, Michael
20 J. Flynn, Bruce Bunch, George O'Neill, Abigail O'Neill and Gail O'Neill
21 were present, and in which litigation concerning the Church of
22 Scientology and/or L. RON HUBBARD was discussed.

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1 REQUEST FOR ADMISSIONS NO. 84:

2 At the meeting mentioned above in Request for Admissions No. 83,
3 and incorporated by reference herein to this Request for Admissions No.
4 84, original materials which had been contained in the Archives Project
5 when GERALD ARMSTRONG was in charge of said project were shown to George,
6 Abigail and Gail O'Neill.

7
8 REQUEST FOR ADMISSIONS NO. 85:

9 At the meeting mentioned above in Request for Admissions No. 83,
10 and incorporated by reference herein to this Request for Admissions No.
11 85, copies of original materials which had been contained in the Archives
12 Project when GERALD ARMSTRONG was in charge of said project were shown to
13 George, Abigail and Gail O'Neill.

14
15 REQUEST FOR ADMISSIONS NO. 86:

16 On or about June 25, 1983, in Los Angeles, California, GERALD
17 ARMSTRONG and Jocelyn Armstrong were present at a talk given by Michael
18 J. Flynn to a group which calls itself "Phoenix."

19
20 REQUEST FOR ADMISSIONS NO. 87:

21 At the talk mentioned above in Request for Admissions No. 86,
22 incorporated by reference herein to this Request for Admissions No. 87,
23 GERALD ARMSTRONG and Jocelyn Armstrong heard Michael J. Flynn discuss the
24 contents of certain documents which Michael J. Flynn referred to as
25 "Archives" documents, indicating that the documents referred to had been
26 furnished to him by GERALD ARMSTRONG from the Archives Project.

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1 REQUEST FOR ADMISSIONS NO. 88:

2 GERALD ARMSTRONG has had discussions with Kevin Flynn concerning
3 original materials and/or copies of original materials which had been
4 contained in the Archives Project when ARMSTRONG was in charge of said
5 project .

6
7 REQUEST FOR ADMISSIONS NO. 89:

8 GERALD ARMSTRONG has had discussions concerning the instant
9 litigation with Martin Samuels between August, 1982 and August, 1983,
10 inclusive.

11
12 REQUEST FOR ADMISSIONS NO. 90:

13 GERALD ARMSTRONG has had discussions concerning the instant
14 litigation with Bent Corydon, or has been involved in such discussions
15 with others when Bent Corydon was present, between August, 1982 and
16 August, 1983, inclusive.

17
18 REQUEST FOR ADMISSIONS NO. 91:

19 During the period between June, 1982 and September, 1982,
20 inclusive, GERALD ARMSTRONG stored original materials and/or copies of
21 original materials which had been contained in the Archives Project when
22 he was in charge of said project, in the home of William T. Crago in San
23 Juan Capistrano, California.

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1 REQUEST FOR ADMISSIONS NO. 92:

2 GERALD ARMSTRONG made no effort to collect the materials referred
3 to above in Request for Admissions No. 91, and incorporated by reference
4 herein to this Request for Admissions No. 92, in order to relinquish
5 control of said materials to the Clerk of the Court, Superior Court of
6 the State of California for the County of Los Angeles, following the
7 issuance of a Temporary Restraining Order issued by the Honorable Judge
8 John Cole in the instant litigation in August, 1982.

9
10 REQUEST FOR ADMISSIONS NO. 93:

11 The storage of materials, referred to above in Request for
12 Admissions No. 91, and incorporated by reference herein to this Request
13 for Admissions No. 93, included the storage of materials which Omar V.
14 Garrison had not requested GERALD ARMSTRONG to store, and which GERALD
15 ARMSTRONG stored solely for his personal use in his legal case.

16
17 REQUEST FOR ADMISSIONS NO. 94:

18 GERALD ARMSTRONG worked for Omar V. Garrison during the period
19 from in or about December, 1981 up to and including May, 1982.

20
21 REQUEST FOR ADMISSIONS NO. 95:

22 GERALD ARMSTRONG was informed by Omar V. Garrison in or about May,
23 1982 that the contract between Omar V. Garrison and Advanced Organization
24 Saint Hill Denmark Publications, whereby Omar V. Garrison was authorized
25 and required to author an authorized biography of L. RON HUBBARD for
26 publishing by said publishing company, was null and void.

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1 REQUEST FOR ADMISSIONS NO. 96:

2 GERALD ARMSTRONG was informed in or about May, 1982 by Omar V.
3 Garrison that any biography of L. RON HUBBARD authored by Omar V.
4 Garrison, and completed subsequent to that date, would not be pursuant to
5 any contract existing prior to that date.

6
7 REQUEST FOR ADMISSIONS NO. 97:

8 Jocelyn Armstrong knew that GERALD ARMSTRONG was going to meet
9 with Michael J. Flynn in Clearwater, Florida prior to the time that
10 GERALD ARMSTRONG left for said meeting on or about May 6, 1982.

11
12 REQUEST FOR ADMISSIONS NO. 98:

13 GERALD ARMSTRONG has made no effort to contact for purely social
14 purposes any members of the Church of Scientology who are themselves in
15 good standing with said Church since in or about December, 1981.

16
17 REQUEST FOR ADMISSIONS NO. 99:

18 GERALD ARMSTRONG has made no effort to contact, for purposes
19 associated with or related to the instant litigation, any members of the
20 Church of Scientology who are themselves in good standing with said
21 Church since in or about December, 1981.

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23 REQUEST FOR ADMISSIONS NO. 100:

24 GERALD ARMSTRONG was resentful of L. RON HUBBARD during the period
25 between July, 1976 and December, 1977, inclusive.

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1 REQUEST FOR ADMISSIONS NO. 101:

2 GERALD ARMSTRONG was resentful of L. RON HUBBARD during the period
3 between January, 1978 and December, 1979, inclusive.

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5 REQUEST FOR ADMISSIONS NO. 102:

6 GERALD ARMSTRONG was resentful of L. RON HUBBARD during the period
7 between January, 1980 and December, 1981, inclusive.

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9 REQUEST FOR ADMISSIONS NO. 103:

10 GERALD ARMSTRONG was resentful of L. RON HUBBARD, and has remained
11 resentful of L. RON HUBBARD, during the period between December, 1981 and
12 the present date.

13
14 REQUEST FOR ADMISSIONS NO. 104:

15 GERALD ARMSTRONG has discussed the consequences to L. RON HUBBARD
16 of affidavits and/or declarations authored and/or executed by GERALD
17 ARMSTRONG with persons other than his, ARMSTRONG'S, attorneys.

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19 REQUEST FOR ADMISSIONS NO. 105:

20 GERALD ARMSTRONG has discussed the consequences to L. RON HUBBARD
21 of affidavits and/or declarations authored and/or executed by GERALD
22 ARMSTRONG with his, ARMSTRONG'S, counsel.

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24 REQUEST FOR ADMISSIONS NO. 106:

25 The research trip taken by GERALD ARMSTRONG in or about July,
26 1981, as a part of his duties as the LRH Senior Personal Public Relations
27 Office Researcher, was funded by CHURCH OF SCIENTOLOGY OF CALIFORNIA.

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1 REQUEST FOR ADMISSIONS NO. 107:

2 A portion of the expense funds for the research trip mentioned in
3 Request for Admissions No. 106 above, and incorporated by reference
4 herein to this Request for Admissions No. 107, were expended for expenses
5 incurred in Phoenix, Arizona in or about July, 1981 during a visit by
6 GERALD ARMSTRONG and Jocelyn Armstrong with the in-laws of GERALD
7 ARMSTRONG.

8
9 REQUEST FOR ADMISSIONS NO. 108:

10 Photographs and negatives of photographs taken by GERALD ARMSTRONG
11 during the research trip noted in Request for Admissions No. 106 above,
12 and incorporated by reference herein to this Request for Admissions No.
13 108, were retained by GERALD ARMSTRONG up to and including May 15, 1982,
14 and some of said photographs and negatives of photographs are still being
15 retained by GERALD ARMSTRONG.

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18 NOTE: IF YOU FAIL TO COMPLY WITH THE PROVISIONS OF SECTION 2033 OF THE
19 CODE OF CIVIL PROCEDURE WITH RESPECT TO THIS REQUEST FOR ADMISSIONS, EACH
20 OF THE MATTERS OF WHICH AN ADMISSION IS REQUESTED WILL BE DEEMED ADMITTED.

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23 END OF REQUEST FOR ADMISSIONS

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DATED: August 12, 1983

TRABISH & PETERSON

By s/ John Peterson

John Peterson, Esq.

Attorney for Plaintiff and Cross-
Defendant, CHURCH OF SCIENTOLOGY OF
CALIFORNIA